

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
Implementation of)	
the Local Competition Provisions of)	CC Docket No. 96-98
the Telecommunications Act of 1996)	
)	
Deaveraged Rate Zones for)	
Unbundled Network Elements)	

Declaration of Sherry Lichtenberg

I, Sherry Lichtenberg, depose and state as follows:

1. I am Senior Manager, OSS Interfaces and Facilities Product Development, for the Mass Markets Division of MCI WorldCom. My duties include designing, managing and implementing MCI WorldCom's provision of local telecommunications services to residential customers on a mass market basis. Among other things, I am responsible for identifying requirements for the development of operations support systems ("OSS") and facilities testing, including MCI WorldCom's participation in third-party testing throughout the country and state-by-state residential market entry/readiness assessment. I have been a member of the MCI WorldCom local service organization for 2 years. Prior to joining MCI WorldCom, I was employed by AT&T for 15 years. My previous experience includes positions as Strategic Pricing Director for AT&T Government Markets, Product Manager for hospitality products, and Strategic Planning and Support Director for the Government sector. I was a member of the initial development team for AT&T's first digital PBXs (System 75 and System 85) and worked on AT&T's initial post-divestiture ordering system, DOSS.

2. In order to enter the residential mass market for local phone service in a given geographic area, MCI WorldCom must have the capacity to serve thousands of new customers, regardless of their location within the region served. This is because mass-market competitive entry on a commercially significant level requires economies of scale and broad-based sales and marketing efforts. Thus, competitive entry into mass markets requires broad access to a network that would enable MCI WorldCom to offer service simultaneously to thousands of customers. Given this need, it is not possible for MCI WorldCom to enter mass markets gradually while it builds out its own local network facilities.

3. Under current market and regulatory conditions, it is also not possible for MCI WorldCom to enter local residential markets by reselling ILEC services. The principal disadvantages of resale are product differentiation and cost. A reseller by definition can offer consumers only the exact same service that is already available from the ILEC itself. Indeed, because the Act as interpreted does not require ILECs to make available for resale services such as voicemail, through resale competitors cannot even offer all of the services already available to consumers directly from ILECs. As a result, resellers cannot differentiate the services they offer. This is a major limitation on resale as a competitive entry strategy. But by far the largest problem with resale is cost. In almost every market, for almost every customer, the wholesale rates set by the states make it unprofitable to compete through resale. At the rates that have been adopted across the country, resale is not a profitable competitive strategy for MCI WorldCom over the long term.

4. Thus, the only way that MCI WorldCom can presently enter many residential mass markets for local phone service is by leasing unbundled network elements (UNEs) from an

ILEC's ubiquitous network. MCI WorldCom has worked hard to put together viable residential mass market offerings using UNEs in several markets, including New York, where MCI WorldCom's efforts are furthest along.

5. MCI WorldCom's experience in creating residential mass market offerings using UNEs has shown that there are innumerable critical preconditions to successfully entering mass markets in this way. One especially critical hurdle is insupportably high prices for UNEs, which create an absolute barrier to competition that stops residential UNE-based mass market entry before it can even get started. Obviously, neither MCI WorldCom nor any other competing phone company can afford to enter a residential mass market if the cost of inputs for mass market service exceeds the revenue that can be received for selling that service. There are numerous states that currently have UNE prices that are too high to allow MCI WorldCom to enter into mass markets there. For example, UNE rates in two of the largest states, California and Florida, are too high for MCI WorldCom to compete using UNEs (or by any other entry strategy).

6. Averaging UNE rates across an entire state has the effect of making UNE rates much higher in densely populated urban areas than they would be if these rates were deaveraged into a minimum of three density zones. Because densely populated urban areas create economies of scale and require much shorter loops connecting switches to customer premises, it costs much less to provide UNEs in urban areas than in sparsely populated rural areas. To take one example, in Illinois the deaveraged loop rate for the most densely populated area (Zone 1) is \$2.59, while for the least densely populated areas (Zone 3) it is \$11.40, or 4.4 times the Zone 1 rate. And the average rate across all three zones in Illinois is \$9.65, or 3.7 times the Zone 1 rate. Thus, if UNE prices were averaged rather than deaveraged in Illinois, the price of a local loop in the heart of

Chicago would be 3.7 times what it is now. Non-cost based rates in urban areas also block entry into adjacent non-urban areas, due to the economies of scale necessary for mass market entry.

7. For states that have so far refused to deaverage UNE prices, such as California and Florida, it is by definition presently impossible to calculate exactly how much lower the UNE prices for urban areas will be when the utility commissions in those states finally do set deaveraged rates. However, experience with deaveraging indicates that prices in urban areas will be much lower than they are now. As a result, it is very likely that in some areas where averaged UNE prices are currently too high to allow mass market entry by MCI WorldCom, profitable UNE-based mass market entry will become economically feasible once deaveraging occurs.

8. In those areas where averaged UNE prices presently preclude UNE-based residential mass market entry, further delay in deaveraging will have long-term consequences as well. Given the huge investments and substantial human resources needed for mass market entry in a geographic area, MCI WorldCom estimates that actual entry into mass markets is likely to come only 12 to 18 months, or even more, after states regulators set deaveraged rates that make UNE-based entry economically viable.

9. In addition, further delay in setting long-term UNE rates has an immediate negative impact on MCI WorldCom's ability to develop and implement its local business strategy. Local service entry by its nature requires long-term planning. Without knowing now whether and when local loops will be available at cost-based rates, it is extremely difficult to plan intelligently for the future. The kinds of local service MCI WorldCom decides to offer customers in 2000 and 2001 -- and the kinds of equipment we will use to provide that service -- depend on investment and market entry choices MCI WorldCom must make now. Thus, even apart from the level of

UNE prices set by regulators, constant regulatory changes which lead to constantly changing prices create their own serious planning problems. MCI WorldCom expected and planned for some level of regulatory uncertainty as the Telecommunications Act of 1996 was put through its paces. But the continued uncertainty ensured by not enforcing the FCC's deaveraging rule for the foreseeable future makes it very difficult to make sensible investment decisions, with long-term adverse repercussions.

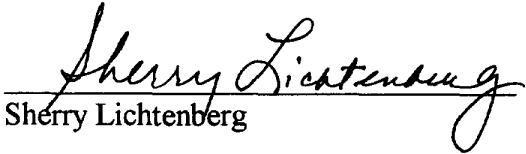
10. Competitive realities dictate that MCI WorldCom make every effort to compete in local markets. When MCI WorldCom is prevented from entering a residential mass market, its losses are not limited to the charges residential customers pay for basic local service. Providing basic local service is also the prerequisite for MCI WorldCom to be able to market advanced services and features (such as voicemail, call waiting, caller ID, etc.) to residential customers and to collect access charges from a residential customer's long-distance provider. Entering the residential mass market for local service is also a prerequisite for MCI WorldCom to market "one-stop shopping" packages that combine local and long-distance service in a single offering, thereby leveraging MCI WorldCom's long-distance services.

11. MCI WorldCom has an additional direct and immediate financial interest in competitive entry into local mass markets. By providing UNE-based local service, MCI WorldCom will not incur the exorbitant access charges imposed upon it by the current monopoly providers of local service. Furthermore, even if MCI WorldCom does not provide local service to all of its own long-distance customers, effective competition in local markets (by MCI WorldCom and other new entrants) will force the ILECs to lower the access charges paid by long-distance carriers. The ability to reduce these access charges doubly benefits MCI WorldCom, because

current exorbitant access charges both greatly increase MCI WorldCom's own cost of doing business as a long-distance provider, and give the monopoly ILECs war chests with which to compete against MCI WorldCom. Regulations that delay competitive entry into local markets also delay the onset of these benefits.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: June 10, 1999


Sherry Lichtenberg

CERTIFICATE OF SERVICE

I, William M. Hohengarten, hereby certify that I have this 10th day of June 1999 caused a true copy of MCI WORLDCOM, Inc. and AT&T Corp.'s Motion for a Stay Pending Judicial Review to be served on the parties listed below by First Class Mail, postage prepaid:

Christopher J. Wright
General Counsel
Federal Communications Commission
445 12th Street, SW, Room 8C723
Washington, DC 20554
(VIA HAND DELIVERY)

ITS, Inc.
445 12th Street, S.W.
Washington, DC 20554
(VIA HAND DELIVERY)

Michael S. Pabian
Counsel for Ameritech
Room 4H82
2000 West Ameritech Center Drive
Hoffman Estates, IL 60196-1025

J. Tyson Covey
Counsel for Ameritech
Mayer, Brown & Platt
190 S. LaSalle Street
Chicago, IL 60603

B.B. Knowles, Director of Utilities
Dave Baker, Chairman
Georgia Public Service Commission
244 Washington Street, SE
Atlanta, GA 30334-5701

James A. Eibel
Network Reliability Council II
Secretariat
7613 William Penn Place
Indianapolis, IN 46256

Rodney L. Joyce
J. Thomas Nolan
Ginsburg, Feldman and Bress
Counsel for Southern New England Tel. Co., Ad Hoc
Coalition of Corporate Telecomm. Managers
1250 Connecticut Avenue, NW
Washington, DC 20036

Janet Reno
Attorney General of the United States
U.S. Dept. of Justice
10th Street and Constitution Ave., N.W.
Washington, D.C. 20530
(VIA HAND DELIVERY)

Robert M. McKenna
Kathryn Marie Krause
James T. Hannon
US West, Inc.
1020 19th Street, N.W., Suite 700
Washington, D.C. 20036

Robert J. Sachs
Howard B. Homonoff
Continental Cablevision, Inc.
Lewis Wharf, Pilot House
Boston, MA 02110

Brenda L. Fox
Continental Cablevision, Inc.
1320 19th Street, N.W., Suite 201
Washington, D.C. 20036

Frank W. Lloyd
Donna N. Lampert
Mintz, Levin, Cohn, Ferris, Glovsky & Popeo
Counsel for America Online, Inc.
701 Pennsylvania Avenue, N.W.
Suite 900
Washington, D.C. 20004

Ronald J. Binz, President
Debra Berlyn, Executive Director
Competition Policy Institute
1156 15th Street, NW, Suite 310
Washington, D.C. 20005

Lee M. Weiner
Douglas W. Kinkoph
LCI International Telecom Corp.
8180 Greensboro Drive
Suite 800
McLean, VA 22102

Kathleen A. Carrigan
Madelyn M. DeMatteo
Alfred J. Brunetti
Maura C. Bollinger
Southern New England Tel. Co.
227 Church Street
New Haven, CT 06506

Laurie Pappas
Deputy Public Counsel
Texas Office of Public Utility Counsel
7800 Shoal Creek Blvd.
Suite 290-E
Austin, TX 78757

Robert C. Glazier
Director of Utilities
Indiana Utility Regulatory Commission
302 W. Washington Street
Room E306
Indianapolis, IN 46204

Paul J. Berman
Alane C. Weixel
Covington & Burling
Counsel for Anchorage Telephone Utility
1201 Pennsylvania Ave., N.W.
PO Box 7566
Washington, DC 20044-7566

Thomas K. Crowe
Counsel for Excel Telecommunications, Inc.
2300 M Street, N.W., Suite 800
Washington, DC 20037

Richard A. Finnigan
Washington Independent Telephone Assoc.
2405 Evergreen Park Drive, S.W.
Suite B-1
Olympia, WA 98502

Robert J. Aarnoth
Jonathan E. Canis
Wendy Kirchick
Reed Smith Shaw & McClay
Counsel for Intermedia Communications, Inc., LCI
International Telecom Corp., and Competitive
Telecommunications Assoc.
1301 K Street, NW
Suite 1100 East Tower
Washington, DC 20005

Morton J. Posner
Eric J. Branfman
Phyllis A. Whitten
Swidler & Berlin, Chartered
Counsel for GST Telecom, Inc.
and WinStar Communications
3000 K Street, NW
Suite 300
Washington, DC 20007

Ernest G. Johnson, Director
John Gray, Sr. Asst. General Counsel
Maribeth D. Snapp, Deputy General Counsel
Oklahoma Corporation Commission
PO Box 25000-2000
Oklahoma City, OK 73152-2000

J. Christopher Dance
Kerry Tassopoulos
Excel Telecommunications, Inc.
9330 LBJ Freeway
Suite 1220
Dallas, TX 75243

Weldon B. Stutzman
Deputy Attorney General
Idaho Public Utilities Commission
472 West Washington Street
Boise, Idaho 83702

Professor Nicholas Economides
Stern School of Business
New York University
New York, NY 10012

Albert Halprin
William F. Maher
Stephen L. Goodman
Halprin, Temple, Goodman & Sugrue
Counsel for Northern Telecom, Inc. and
BellSouth Corporation
1100 New York Avenue, N.W.
Suite 650, East Tower
Washington, DC 20005

Wayne V. Black
C. Douglas Jarrett
Susan M. Hafeli
Keller and Heckman
Counsel for American Petroleum Institute
1001 G Street, NW
Suite 500 West
Washington, DC 20001

Steven T. Nourse
Assistant Attorney General
Public Utilities Section
Public Utilities Commission of Ohio
180 East Broad Street
Columbus, Ohio 43266-0573

Veronia M. Ahern
Nixon Hargrave Devans & Doyle
Counsel for Guam Telephone Authority
One Thomas Circle, NW
Suite 800
Washington, DC 20005

Harold Crumpton, Commissioner
Missouri Public Service Commission
PO Box 360
Jefferson City, MO 65102

Terrence M. Baun
Dane E. Ericksen
Christopher D. Imlay
Booth, Feret & Imlay
Counsel for Society of Broadcast
Engineers, Inc.
1233 20th Street, N.W., Suite 204
Washington, D.C. 20036

Marc A. Stone
Fred Williamson & Associate
2921 E. 91st Street, Suite 200
Tulsa, OK 74137-3300

John G. Lamb, Jr.
Northern Telecom, Inc.
2100 Lakeside Blvd.
Richardson, TX 75081-1599

Stephen G. Oxley
Administrator
Wyoming Public Service Commission
700 West 21st Street
Cheyenne, Wyoming 82002

David Heinemann, General Counsel
Julie Thomas Bowles, Asst. General Counsel
Kansas Corporation Commission
1500 SW Arrowhead Road
Topeka, KS 66604

Nebraska Rural Development Commission
PO Box 94666
Lincoln, Nebraska 68509-4666

Brian R. Moir
Moir and Hardman
Counsel for Intl Communications Assn.
2000 L Street, NW, Suite 512
Washington, DC 20036

Colorado Independent Telephone Assoc.
3236 Hiwan Drive
Evergreen, CO 80439

Antoinette R. Wike, Chief Counsel
North Carolina Public Staff Utilities
Commission
PO Box 29520
Raleigh, NC 27626-0520

Jerome K. Blask
Daniel E. Smith
Gurman, Blask & Freedman, Chartered
Counsel for Pronet, Inc.
1400 16th Street, NW, Suite 500
Washington, DC 20036

Jonathan M. Chambers
Sprint Spectrum, L.P.
1801 K Street, N.W.
Suite M-112
Washington, D.C. 20036

Jonathan D. Blake
Kurt A. Wimmer
Covington & Burling
Counsel for Sprint Spectrum and
American Personal Communications
1201 Pennsylvania Ave., N.W.
PO Box 7566
Washington, DC 20044-7566

Robert A. Mazer
Albert Shuldiner
Mary Paper
Vinson & Elkins
Counsel for the Lincoln Telephone and
Telegraph Company
1455 Pennsylvania Ave., NW
Washington, DC 20004-1008

James U. Troup
L. Charles Keller
Arter & Hadden
Counsel for Bay Springs Telephone Co.
1801 K Street, N.W., Suite 400K
Washington, D.C. 20006

Gary L. Mann
Authorized Representative
Texas Statewide Telephone Cooperative, Inc.
3721 Executive Center Drive, Suite 200
Austin, TX 78731-1639

Mark J. Golden
Robert R. Cohen
Personal Communications Industry Assoc.
500 Montgomery St., Suite 700
Alexandria, VA 22314-1561

Bradley Stillman
Dr. Mark N. Cooper
Consumer Federation of America
1424 16th Street, NW
Washington, DC 20036

Anne P. Schelle
American PCS, L.P.
6901 Rockledge Drive
Suite 600
Bethesda, MD 20817

George Petrutsas
Paul J. Feldman
Fletcher, Heald, Hildreth., P.L.C.
Counsel for Roseville Telephone Co.
1300 North 17th Street, 11th Floor
Arlington, VA 22209

Richard M. Tettelbaum
Citizens Utilities Company
1400 16th Street, NW, Suite 500
Washington, DC 20036

Eric B. Witte
Assistant General Counsel
Missouri Public Service Commission
PO Box 360
Jefferson City, MO 65102

Chris Barron
TCA, Inc.
3617 Betty Drive, Suite I
Colorado Springs, CO 80917

Timothy R. Graham
Robert M. Berger
Joseph M. Sandri, Jr.
Winstar Communications, Inc.
1146 19th St., N.W.
Washington, D.C. 20036

Dana Frix
Mary Albert
Antony Petrilla
Douglas Bonner
Counsel for Hyperion
Telecommunications, Inc.
Swidler & Berlin, Chartered
3000 K Street, N.W., Suite 300
Washington, D.C. 20007

Brad E. Mutschelknaus
Steve Augustino
Kelly, Drye & Warren
Counsel for American Communications
Services, Inc.
1200 19th Street, N.W., Suite 500
Washington, D.C. 20036

Robert S. Tongren
Office of the Ohio Consumers' Counsel
77 South High Street, 15th Floor
Columbus, Ohio 43266-0550

Linda Kent
Charles Cosson
Keith Townsend
United States Telephone Association
1401 H Street, N.W., Suite 600
Washington, D.C. 20005

J. Manning Lee
Teresa Marrero
Teleport Communications Group, Inc.
One Teleport Drive, Suite 300
Staten Island, NY 10311

Paul Rogers
Charles Gray
James Ramsay
National Assoc. of Regulatory Utility
Commissioners
1102 ICC Building, PO Box 684
Washington, DC 20044

Mark J. Tauber
Ronald L. Plessner
Mark J. O'Connor
Piper & Marbury, LLP
Counsel for Omnipoint Corporation and Commercial
Internet Exchange Assn.
1200 19th Street, NW, 7th Floor
Washington, DC 20036

Riley M. Murphy
Charles Kallenbach
American Communications Services, Inc.
131 National Business Parkway
Suite 100
Annapolis Junction, MD 20701

Christopher Kemply
Deborah Scott
Arizona Corporation Commission
Legal Division
1200 West Washington Street
Phoenix, AZ 85007

Glen A. Schmiede
Foster, Swift, Collins & Smith
Counsel for Michigan Exchange
Carriers Assn
313 South Washington Square
Lansing, MI 48933

James D. Ellis
Robert M. Lynch
David F. Brown
Counsel for SBC Communications, Inc.
175 E. Houston, Room 1254
San Antonio, TX 78205

Don Shroer, Chairman
Alaska Public Utilities Commission
1016 West Sixth Avenue
Suite 400
Anchorage, Alaska 99501

Joanne Salvatore Bochis
National Exchange Carrier Association
100 South Jefferson Road
Whippany, NJ 07981

Kathy L. Shobert
General Communications, Inc.
901 15th Street, N.W.
Suite 900
Washington, DC 20005

Robert C. Schoonmaker
GVNW Inc.
PO Box 25969
Colorado Springs, CO 80936

Alfred M. Mamlet
Colleen A. Sechrest
Steptoe & Johnson, LLP
Counsel for Telefonica Larga Distancia
de Puerto Rico, Inc.
1330 Connecticut Ave., N.W.
Washington, DC 20036

Carolyn Hill
Counsel for ALLTEL Telephone
Services Corp.
655 15th Street, N.W., Suite 220
Washington, DC 20005

Maureen O. Helmer
Lawrence G. Malone
General Counsel
State of NY Dept. of Public Service
Three Empire State Plaza
Albany, NY 12223-1350

Charles C. Hunter
Catherine M. Hannan
Hunter Communications Law Group
Counsel for Telecommunications
Resellers Association
1620 Eye Street, N.W., Suite 701
Washington, D.C. 20006

Richard A. Finnigan
Washington Independent Telephone Ass'n
2405 Evergreen Park Drive, SW, Suite B-1
Olympia, WA 98502

J. Scott Bonney
Nextlink Communications, LLC
155 108th Avenue, N.W.
Bellevue, WA 98004

Richard Rubin
Steven Teplitz
Fleischman and Walsh, LLP
Counsel for Centennial Cellular Corp.
1400 16th Street, N.W., Suite 600
Washington, D.C. 20036

Encarnita Catalan-Marchan
Maria Pizarro-Figueroa
Telefonica Larga Distancia de
Puerto Rico, Inc.
Metro Office Park
Building No. 8, Street No. 1
Guaynabo, PR 00922

Edward C. Addison, Director
Division of Communications
Virginia State Corporation Commission
PO Box 1197
Richmond, VA 23218

Stephen R. Rosen
Theodore M. Weitz
Counsel for Lucent Technologies, Inc.
475 South Street
Morristown, NJ 07962-1976

Steve Hamlen
Unicom, Inc.
5450 A Street
Anchorage, Alaska 99518

Richard Johnson
Michael Bradley
Moss & Barnett
Counsel for Minnesota Independent Coalition
4800 Norwest Center
90 South Seventh Street
Minneapolis, MN 55402-4129

Davis Wright Tremaine
Daniel M. Waggoner
Counsel for Nextlink Communications
2600 Century Square
1501 Fourth Avenue
Seattle, WA 98101

Joe D. Edge
Richard J. Arsenault
Tina M. Pidgeon
Drinker, Biddle & Reath
Counsel for Puerto Rico Telephone Co.
901 15th Street, NW
Washington, DC 20005

Karen Finstad Hammel
Montana Public Service Commission
1701 Prospect Avenue
PO Box 202601
Helena, Montana 59620-2601

E. Barclay Jackson
New Hampshire Public Utilities Commission
8 Old Suncook Road
Concord, NH 03301-7319

Stephen F. Mecham
160 East 300 South
PO Box 45585
Salt Lake City, Utah 84145

Sheldon M. Katz
George E. Young
Vermont Dept. of Public Service
Drawer 20
Montpelier, VT 05620-2601

Charles H. Helein
Helein & Associates
General Counsel for America's Carrier's
Telecommunications Ass'n
8180 Greensboro Drive, Suite 700
McLean, VA 22102

Gene Belardi
MobileMedia Communications, Inc.
2101 Wilson Blvd., Suite 935
Arlington, VA 22201

Howard J. Symons
Cherie R. Kiser
Russell C. Merbeth
Sara Seidman
Counsel for Tele-Communications, Inc.
and NCTA
Mintz, Levin, Cohn, Ferris, Glovsky & Popeo
701 Pennsylvania Ave., N.W., Suite 900
Washington, D.C. 20004

Joel B. Shifman
Maine Public Utilities Commission
242 State Street
State House Station No. 18
Augusta, Maine 04333-0018

Commissioner Lowell C. Johnson
Nebraska Public Service Commission
300 The Atrium, 1200 N Street
PO Box 94297
Lincoln, Nebraska 68509-4927

David Kaufman
New Mexico State Corporation Commission
PO Box 1269
Santa Fe, NM 87504-1269

Michael L. Ginsberg
Assistant Attorney General
160 East 300 South
PO Box 146751
Salt Lake City, Utah 84145

Rolayne Ailts
South Dakota Public Utilities Commission
500 East Capital
Pierre, SD 57501

C.J. Cain
Utilix
PO Box 991
Greenville, NC 27834

Joseph W. Waz, Jr.
Beth O'Donnell
Comcast Corporation
1500 Market Street
Philadelphia, PA 19102

Susan Drombetta
Scherers Communications Group
575 Scherers Court
Worthington, OH 43085

Cindy Schonhaut
IntelCom Group (USA), Inc.
9605 East Maroon Circle
Englewood, CO 80112

Rachel J. Rothstein
Ann Morton
Cable and Wireless, Inc.
8219 Leesburg Pike
Vienna, VA 22182

Phillip L. Ververr
Brian Conboy
Sue Blumenfeld
Thomas Jones
Willkie Farr & Gallagher
Counsel for Tele-Communications, Inc. and
Time Warner Communications Holdings
Three Lafayette Centre
1155 21st Street, N.W.
Washington, DC 20036

R. Glenn Rhyne
South Carolina Public Service Commission
PO Drawer 11649
Columbia, SC 29211

Mary F. Newmeyer
John Garner
Alabama Public Service Commission
PO Box 991
Montgomery, AL 36101

Carol Weinhaus
Public Utility Research Center
College of Business Administration
University of Florida
Meeting House Offices
121 Mount Vernon Street
Boston, MA 02108

Lawrence D. Crocker, III
Public Service Commission of
the District of Columbia
450 Fifth Street, NW
Washington, DC 20001

Albert H. Kramer
Robert F. Aldrich
Dickstein, Shapiro & Morin, LLP
Counsel for IntelCom Group, American
Public Communications Council
2101 L Street, N.W.
Washington, D.C. 20037-1526

Danny E. Adams
John J. Heitmann
Kelley Drye & Warren LLP
1200 19th Street, N.W.
Suite 500
Washington, DC 20036

Bridger Mitchell
Charles River Associates, Inc.
285 Hamilton Ave., Suite 370
Palo Alto, CA 94301

Dr. Barbara O'Connor
Mary Gardiner Jones
Henry Geller
Alliance for Public Technology
901 15th Street, Suite 230
Washington, DC 20005

Rebecca S. Weeks
Carl Wayne Smith
Defense Information Systems Agency
701 S. Courthouse Road
Arlington, VA 22204

Thomas R. Gibbon
Charles A. Zielinski
Anthony M. Black
Bell, Boyd & Lloyd
1615 L Street, N.W., Suite 1200
Washington, D.C. 20036

Gerald Zuckerman
Edward Myers
Communications and Energy Dispute
Resolution Associates
International Square
1825 Eye Street, N.W., Suite 400
Washington, DC 20006

Timothy E. Welch
Hill and Welch
City of Bogue, Kansas
1330 New Hampshire Ave., N.W., Suite 113
Washington, D.C. 20036

Pamela Riley
AirTouch Communications, Inc.
One California Street
San Francisco, CA 94111

Judith St. Ledger-Roty
Paul G. Madison
Reed Smith Shaw & McClay
Counsel for Paging Network, Inc.
1301 K Street, NW
Suite 1100 - East Tower
Washington, DC 20005-3317

Danny E. Adams
Steven A. Augustino
Kelley, Drye & Warren, LLP
Counsel for American Network
Exchange, Inc. and US Long Distance, Inc.
1200 19th Street, NW, Suite 500
Washington, DC 20036

David W. Carpenter
Peter D. Keisler
Sidley & Austin
Counsel for AT&T Corporation
1722 Eye Street, N.W.
Washington, DC 20006

W. Benny Won
Public Utility Section
Oregon Department of Justice
1162 Court Street, NE
Salem, OR 97310

Fiona Branton
Information Technology Industry Council
1250 Eye Street, NW
Washington, DC 20005

Perry Woofert
Counsel for United Calling Networks, Inc.
1200 29th Street, N.W., Suite 200
Washington, D.C. 20007

David A. Gross
AirTouch Communications, Inc.
1818 N Street, N.W., Suite 800
Washington, DC 20036

David Jatlow
Young and Jatlow
Counsel for the Ericsson Company
2300 N Street, NW, Suite 600
Washington, DC 20036

Carl W. Northrop
Christine M. Crowe
Paul, Hastings, Janofsky & Walker
Counsel for Arch Communications
Group, Inc.
1299 Pennsylvania Ave., N.W., 10th Flr.
Washington, D.C. 20004

Daniel Brenner
Neal Goldberg
David Nicoll
National Cable Television Assoc., Inc.
1724 Massachusetts Ave., N.W.
Washington, DC 20036

Mark Rosenblum
Roy Hoffinger
Stephen Garavito
Richard Rubin
AT&T Corporation
295 North Maple Avenue, Room 324511
Basking Ridge, NJ 07920

James Baller
The Baller Law Group
Counsel for the American Public Power Assn.
1820 Jefferson Place, NW, Suite 200
Washington, DC 20036

Henry Rivera
Larry Solomon
J. Thomas Nolan
Ginsburg, Feldman & Bress, Chartered
Counsel for Metricom, Inc.
1250 Connecticut Ave., N.W.
Washington, DC 20036

Mark J. Palchick
Vorys, Sater, Seymour and Pease
Counsel for Buckeye Cablevision, Inc.
1828 L Street, N.W., Suite 1111
Washington, D.C. 20036

Genevieve Morelli
Competitive Telecommunications Association
1140 Connecticut Ave., N.W., Suite 220
Washington, D.C. 20036

Maudine Cooper
Greater Washington Urban League, Inc.
3501 14th Street, NW
Washington, DC 20010

Cheryl A. Tritt
Charles H. Kennedy
Morrison & Foerster, LLP
Counsel for the Western Alliance and
Brooks Fiber Properties
2000 Pennsylvania Ave., N.W., Suite 5500
Washington, DC 20006

Raymond Bender, Jr.
J.G. Harrington
Dow, Lohnes & Albertson
Counsel for Vanguard Cellular Systems, Inc.
1200 New Hampshire Ave., N.W., #800
Washington, DC 20036

John Crump
National Bar Association
1225 11th Street, NW
Washington, DC 20001

Dwight Zimmerman
Illinois Independent Telephone Ass'n
RR 13, 24B Oakmont Road
Bloomington, IL 61704

Kevin Gallagher
360 Communications Company
8725 West Higgins Road
Chicago, IL 60631

Edward Hayes, Jr.
1155 Connecticut Ave., N.W.
Third Floor
Washington, DC 20036

Tim Raven
Texas Telephone Association
400 West 15th Street, Suite 1005
Austin, TX 78701-1647

Joe D. Carpenter
Telecommunications Industry Ass'n
1201 Pennsylvania Ave., N.W.
Suite 315
Washington, DC 20044-0407

Reginald Bernard
SDN Users Association, Inc.
PO Box 4014
Bridgewater, NJ 08807

Christopher W. Savage
Robert G. Scott
Cole, Raywid and Braverman, LLP
Counsel for Adelphia Communications
and Joint Commenters
1919 Pennsylvania Ave., N.W., 2nd Floor
Washington, DC 20006

Earl Pace
BDPA
1250 Connecticut Ave., N.W.
Suite 610
Washington, DC 20036

Richard Koch
10 Lilac Street
Sharon, MA 02067

Anne Schelle
American Personal Communications
One Democracy Center
6901 Rockledge Drive, Suite 600
Bethesda, MD 20817

Curtis White
Allied Associated Partners and GELD
Information Systems
4201 Connecticut Ave., N.W.
Washington, DC 20008

Winston Pittman
Chrysler Minority Dealers Assoc.
American Center
27777 Franklin Road, Suite 1105
Southfield, MI 48034

Bettye Gardner
Afro-American Life and History, Inc.
1407 14th Street, N.W.
Washington, D.C. 20005

Amy Dougherty
Kentucky Public Service Commission
PO Box 615
Frankfort, KY 40602

Robert Hix
Vincent Majkowski
Colorado Public Utilities Commission
1580 Logan Street
Office Level 2
Denver, CO 80203

Richard Metzger
Emily Willams
Association for Local Telecommunications
Services
1200 19th Street, N.W., Suite 560
Washington, D.C. 20036

William H. Smith, Jr.
Allan Kneip
Iowa Utilities Board
Lucas State Office Bldg.
Des Moines, IA 50319

Elizabeth Sachs
Lukas, McGowan, Nace & Gutierrez
Counsel for American Mobile
Telecommunications Association, Inc.
1111 19th Street, N.W., 12th Flr.
Washington, D.C. 20036

M. Robert Sutherland
Richard M. Sbaratta
Theodore R. Kingsley
Counsel for BellSouth
1155 Peachtree Street, N.E., Suite 1700
Atlanta, GA 30309-3610

Erich Breisach
Counsel for Small Business Administration
Howard & Howard Attorneys, PC
The Michigan Building, Suite 200
100 Portage Street
Kalamazoo, MI 49007-4802

Martha Hogerty
Public Counsel, State of Missouri
on behalf of NASUCA
1133 15th Street, N.W., Suite 550
Washington, D.C. 20005

Robert Hart
Hart Engineers
PO Box 66436
Baton Rouge, LA 70896

Thomas Taylor
Jack Harrison
Christopher J. Wilson
Cincinnati Bell Telephone
2500 PNC Center
201 E. Fourth Street
Cincinnati, OH 45202

Leon Kestenbaum
Jay Keithly
Norina T. Moy
H. Richard Juhnke
Sprint Corporation
1850 M Street, N.W., 11th Flr.
Washington, DC 20036

Alan Shark
American Mobile Telecommunications
Association, Inc.
1150 18th Street, N.W., Suite 250
Washington, D.C. 20036

Reginald J. Smith
Connecticut Public Utility Control
10 Franklin Square
New Britain, CT 06051

Jeffrey L. Sheldon
Sean A. Stokes
UTC
1140 Connecticut Ave., N.W., Suite 1140
Washington, DC 20036

Christopher C. Cinnamon
Counsel for Small Business Administration
Bienstock & Clark
311 South Wacker Drive, South 4550
Chicago, IL 60606

Maureen Scott
Pennsylvania Public Utility Commission
PO Box 3265
Harrisburg, PA 17105-3265

John Howe
Mary Webster
Janet Besser
Massachusetts Dept. of Public Utilities
100 Cambridge Street, 12th Flr
Boston, MA 02202

Jere W. Glover
David Zesiger
Office of Advocacy
US Small Business Administration
409 3rd Street, SW, Suite 7800
Washington, DC 20416

Michael J. Ettner
Personal Property Division
General Services Administration
18th and F Streets, N.W.
Room 4002
Washington, D.C. 20405

Daniel Mitchell
Regulated Industries Division
Commonwealth of Massachusetts
200 Portland Street
Boston, MA 02114

Andrew Lipman
Russell Blau
Mary C. Albert
Counsel for KMC Telecom
Swidler & Berlin, Chartered
3000 K Street, N.W., Suite 300
Washington, D.C. 20007

Dixie Horning
Gary Panthers
2025 Pennsylvania Ave., N.W.
Suite 821
Washington, DC 20006

Camile Failla-Murphy
Nat'l Association of Commissions
for Women
1828 L Street, N.W.
Washington, DC 20036

Jordan Clark
United Homeowners Assn
1511 K Street, NW
Washington, DC 20005

Michael Hammer
Michael Jones
Jennifer Desmond
Willkie, Farr & Gallagher
Counsel for Time Warner Cable
Three Lafayette Center
1155 21st Street, N.W.
Washington, DC 20036

Cynthia Miller
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

Robert Kittle
Office of the Judge Advocate General
US Army Litigation Center
901 N. Stuart Street, Suite 713
Arlington, VA 22203

Ken Solomon
New Mexico State Corporation Commission
PO Drawer 1269
Santa Fe, NM 87504-1269

Aliceann Wohlbruck
National Association of Development
Organization
444 North Capitol Street, N.W.
Suite 630
Washington, DC 20001

Edmund H. Worthy, Jr.
United Seniors Health Cooperative
1331 H Street, Suite 500
Washington, DC 20005

Stephen Protulis
National Council of Senior Citizens
1331 F Street, NW
Washington, DC 20004

Dr. Mara Sotomayor
National Hispanic Council on Aging
2713 Ontario Road
Washington, DC 20009

Dr. Garry A. Mendez
The National Trust/TrustNet
7411 Riggs Road
Adelphi, MD 20783

Linda Oliver
Counsel for Telecommunications Carriers
for Competition
Hogan & Hartson
555 13th Street, N.W.
Washington, D.C. 20004

Colleen Boothby
Laura F. McDonald
Levine, Blaszak, Block & Boothby
Counsel for Internet Access Coalition
1300 Connecticut Ave., N.W., Suite 500
Washington, D.C. 20036

Werner Hartenberger
Leonard Kennard
J.G. Harrington
Dow, Lohnes & Albertson
1200 New Hampshire Ave., N.W., #800
Washington, D.C. 20036

Paul Schroeder
AFB Midwest
401 N. Michigan Ave., Suite 308
Chicago, IL 60611

Alan Dinsmore
American Foundation for the Blind
1615 M Street, N.W., Suite 250
Washington, D.C. 20036

Terrence P. McGarty
COMAV Corp.
60 State Street, 2nd Flr.
Boston, MA 02109

Scott Harshbarger
Daniel Mitchell
Commonwealth of Massachusetts
Public Protection Bureau
200 Portland Street, 4th Flr.
Boston, MA 02114

David W. McGann
Illinois Commerce Commission
160 North LaSalle Street
Suite C-800
Chicago, IL 60601

Susan M. Gateley
Susan Baldwin
Economics and Technology, Inc.
One Washington Mall
Boston, MA 02108

Riley Murphy
Charles Kallenbach
American Communications Services, Inc.
131 National Business Parkway, Suite 100
Annapolis Junction, MD 20701

Bryan G. Moorhouse
Susan Stevens Miller
Maryland Public Service Commission
6 St. Paul Street
Baltimore, MD 21202

James Rowe
Alaska Telephone Association
4341 B Street, Suite 304
Anchorage, AK 99503

Peter Arth, Jr.
Edward W. O'Neill
Mary Mack Adu
Counsel for the People of the State of Calif.
and the Public Utilities Commission of the
State of California
505 Van Ness Avenue
San Francisco, CA 94102

H. Keith Oliver
Home Telephone Co., Inc.
200 Tram Street
Moncks Corner, SC 29451

Greg Berberich
Matanuska Telephone Assn., Inc.
1740 South Chugach Street
Palmer, AK 99645

Agris Pavlovskis
Michigan Exchange Carriers Ass'n, Inc.
1400 Michigan National Tower
Lansing, MI 48911

John G. Strand
John L. O'Donnell
John C. Shea
William J. Celio
Ronald G. Choura
Michigan Public Service Commission
6545 Mercantile Way
Lansing, MI 48911

Karen Finstand Hammel
Montana Public Service Commission
1702 Prospect Ave.
PO Box 202601
Helena, MT 59620-2601

Douglas L. Povich
Kelly & Povich
Counsel for the National Wireless
Resellers Assoc.
1101 30th Street, N.W., Suite 300
Washington, DC 20007

Robert P. Gruber
Antoinette R. Wike
North Carolina Utilities Commission
430 North Salisbury Street
PO Box 29520
Raleigh, NC 27626-0520

Betty D. Montgomery
Duane W. Luckey
Steven T. Nourse
Jodie Jenkins Blair
Public Utilities Commission of Ohio
180 E. Broad Street
Columbus, OH 43215-3793

Michael S. Fox
John Staurulakis, Inc.
5315 Seabrook Road
Seabrook, MD 20706

Pat Wood, III
Robert W. Gee
Judy Walsh
Public Utility Commission of Texas
7800 Shoal Creek Blvd.
Austin, TX 78757

Tim Raven
Texas Telephone Association
400 West 15th Street, Suite 1005
Austin, TX 78701-1647

Paul B. Jones
Janis A. Stahlhut
Donald F. Shephard
Time Warner Communications Holdings, Inc.
300 Stamford Place
Stamford, CT 06902

Aaron I. Fleischman
Richard Rubin
Mitchell F. Brecher
Steven N. Teplitz
Fleischman and Walsh
Counsel for Time Warner Communications
Holdings, Inc.
400 16th Street, N.W.
Washington, D.C. 20036

Jennifer Simpson
United Cerebral Palsy Associations
1660 L Street, N.W., Suite 700
Washington, D.C. 20036

Edmund H. Worthy, Jr.
United Senior Health Cooperative
1331 H Street, Suite 500
Washington, D.C. 20005

Donald Russell
Andrew Joskow
John Henly
Luin Fitch
US Dept. of Justice Antitrust Division
555 4th Street, N.W., Room 8104
Washington, D.C. 20001

David Cosson
L. Marie Guillory
Steven E. Watkins
Counsel for NTCA
2626 Pennsylvania Ave., N.W.
Washington, DC 20037

Robert S. Foosaner
Lawrence R. Krevor
Laura L. Holloway
Nextel Communications, Inc.
800 Connecticut Ave., N.W., Suite 1001
Washington, DC 20006

Roy L. Morris
Frontier Communications Services, Inc.
1990 M Street, N.W., Suite 500
Washington, DC 20026

James N. Harwood
Scott H. Strauss
Wendy S. Lader
Counsel for Municipal Utilities
Spiegel & McDiarmid
1350 New York Ave., N.W.
Suite 1100
Washington, D.C. 20005-4798

Robert T. Blau
BellSouth Corporation
1133 21st Street, N.W.
Washington, DC 20036-3351

James U. Troup
L. Charles Keller
Arter & Hadden
Counsel for Vartec Telecom, Inc., Transtel, Telephone
Express, CGI and Communigroup
Inc. of Mississippi
1801 K Street, N.W., Suite 400K
Washington, D.C. 20006

Margot Smiley Humphrey
Counsel for NRTA and TDS
Telecommunications Corp.
Koteen & Naftalin, LLP
1150 Connecticut Ave., N.W.
Suite 1000
Washington, D.C. 20035

Lisa M. Zaina
Ken Johnson
Counsel for OPASTCO
21 Dupont Circle, NW, Suite 700
Washington, DC 20036

Michael J. Shortley III
Counsel for Frontier Corporation
180 South Clinton Avenue
Rochester, NY 14646

Lawrence St. Blance
Gayle T. Kellner
Louisiana Public Services Commission
PO Box 91154
Baton Rouge, LA 70821-9154

Vicki Oswalt
Public Utility Commission of Texas
7800 Shoal Creek Blvd.
Austin, TX 78757-1098

Robert M. Lynch
SBC Communications, Inc.
One Bell Plaza, Room 3703
Dallas, TX 75202

David W. Carpenter
Joseph R. Guerra
Sidley & Austin
1722 Eye Street, NW
Washington, DC 20006

Joseph T. Garrity
Qwest Communications Corporation
555 17th Street
Denver, CO 80202

Mark A. Stachiw
AirTouch Paging
12221 Merit Drive, Suite 800
Dallas, Texas 75251

Randolph J. May
Sutherland, Asbill & Brennan
Counsel for CompuServe inc.
1275 Pennsylvania Ave., N.W.
Washington, DC 20004-2404

Richard M. Rindler
Counsel for Business Telecom, Inc.
Swidler & Berlin, Chartered
3000 K Street, N.W., Suite 300
Washington, DC 20007

Donald T. Dunning
Counsel for North County Comm. Corp.
Dicks & Dunning, LLP
2310 Symphony Towers
750 B Street
San Diego, CA 92101-8122

Jonathan J. Nadler
Counsel for Information Technology Assoc.
of America
Squire, Sanders & Dempsey
1201 Pennsylvania Ave., N.W.
Washington, DC 20044

John T. Scott, III
Bell Atlantic Nynex Mobile, Inc.
1001 Pennsylvania Ave., N.W.
Washington, DC 20004

Tiki Gaugler
Jane Kunka
Qwest Communications Corporation
4250 North Fairfax Drive
12W002
Arlington, VA 22203

James M. Smith
Excel Telecommunications, Inc.
1133 Connecticut Ave., N.W.
Suite 750
Washington, D.C. 20036

Gary L. Phillips
Counsel for Ameritech
1401 H Street, N.W., Suite 1020
Washington, DC 20005

David E. Colton
United States Internet Council
1100 New York Ave., N.W.
Suite 750 West
Washington, DC 20005

Glenn B. Manishin
Christine A. Mailloux
Counsel for SpectraNet Int'l
Blumenfeld & Cohen-Technology Law Group
1615 M Street, N.W., Suite 700
Washington, DC 20036

Philip L. Verveer
Jennifer A. Donaldson
Angie Kronenberg
Counsel for CTIA
Willkie Farr & Gallagher
1155 21st Street, N.W., Suite 600
Three Lafayette Centre
Washington, DC 20036-3384

Michael E. Glover
Leslie A. Vial
James G. Pachulski
Lydia Pulley
Bell Atlantic
1320 N. Court House Road, 8th Flr.
Arlington, VA 22201

Michael F. Altschul
Randall S. Coleman
Cellular Telecommunications Industry Assoc.
1250 Connecticut Ave., N.W., Suite 200
Washington, D.C. 20036

Desoto County, Mississippi
Economic Development Council
2475 Memphis Street
Hernando, Mississippi 38632

Earl Pace
Black Data Processors Association
1250 Connecticut Ave., N.W., Suite 610
Washington, D.C. 20036

Scott Harshbarger
Daniel Mitchell
Commonwealth of Massachusetts
Office of Attorney General
200 Portland Street, 4th Floor
Boston, MA 02114

Bruce Hagen
Susan E. Wefald
Leo M. Reinbold
North Dakota Public Service Commission
North Dakota Public Service
State Capital - 12th Floor
Bismarck, ND 58505-0480

Marlin D. Ard
Randall E. Cape
John W. Bogy
Pacific Telesis Group
140 New Montgomery Street
Rm. 1530A, 15th Flr.
San Francisco, CA 94105


William P. Barr
Ward W. Wueste
Gail L. Polivy
GTE Service Corporation
1850 M Street, N.W., Suite 1200
Washington, D.C. 20036

Christopher W. Savage
Navid C. Haghighi
Jones Intercable, Inc.
Cole, Raywid & Braverman, LLP
1919 Pennsylvania Ave., N.W., Suite 200
Washington, D.C. 20006

Ann Kutter
Douglas Elfner
NY State Consumer Protection Board
99 Washington Ave., Suite 1020
Albany, NY 12210

William J. Balcerski
Saul Fisher
Nynex Telephone Companies
1111 Westchester Avenue
White Plains, NY 10604

Rebecca S. Weeks
Carl Wayne Smith
Secretary of Defense
Defense Information Sys. Agency
701 S. Courthouse Road
Arlington, VA 22204



William M. Hohengarten